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According to the method, an asymmetric transformation is applied to map a resolution-independent representation of the region into a resolution-independent representation of a transformed region. A vector-based trapping engine processes the transformed region to generate transformed traps represented as vectors. An inverse transformation (of the asymmetric transformation) is applied to the transformed traps represented as vectors to map those transformed traps to a device space. Claim 27 is a computer program product claim that includes analogous limitations.

The rejection states that "the 'asymmetric' behavior described by Applicant appears to be inherently related to device resolution in horizontal and vertical directions (e.g. Page 2, lines 20-21)" and concludes that "it is unclear how an 'asymmetric' mapping related to this 'asymmetric' behavior can be defined in 'resolution-independent' terms."

The applicant first notes that the asymmetries addressed by the present invention do not necessarily have anything to do with device resolution in the horizontal and vertical directions. Rather, as explained in the applicant's specification, the invention is directed to addressing asymmetries in device misregistration behavior, which can be caused by a variety of factors, at least some of which can have nothing to do with device resolution. *See* page 4, lines 12-22 (identifying, among other potential causes of such behavior, shrinkage or stretching of paper as it is fed through a press). Thus, the applicant submits that while the asymmetric behavior in question may be inherently *device dependent*, the premise of the rejection – that the asymmetric behavior is inherently or necessarily *resolution dependent* – is mistaken.

Moreover, the applicant respectfully submits that nothing in claim 13 requires that the asymmetric transformation be "defined in 'resolution-independent' terms", as the rejection suggests. Instead, claim 13 is directed to a method in which a resolution-independent representation of a region (for example, a resolution-independent vector description of the region in a page description language, as discussed at page 1, lines 19-29 of the present specification) is transformed into a resolution-independent representation of a transformed region (which presumably can also be expressed as a vector description according to a PDL) by applying an asymmetric transformation to the former representation. One embodiment of such a method is described in the context of Figure 1, at page 5, lines 3-21 of the specification.

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While claim thus specifies that the representation of the region and the representation of the transformed region are both resolution independent (*e.g.*, vector-based PDL representations), nothing in the claim requires that the transformation itself be independent of device resolution. Indeed, the applicant's specification specifically notes that the asymmetric transformation can take device resolution into account. *See, e.g.*, page 7, lines 15-18 (noting that the asymmetric transformation can be derived in part from the device asymmetry if the device has asymmetric resolution).

For at least these reasons, the applicant respectfully submits that neither claim 13 nor 27 is indefinite under 35 U.S.C. § 112, and requests that the rejection under section 112 of claims 13 and 27 be withdrawn.

Claims 14 and 28. Claims 14 and 28 are dependent claims based on claims 13 and 27, respectively. The applicant respectfully submits that claims 14 and 28 are allowable, and requests that the rejection under section 112 be withdrawn as to these claims, for at least the reasons discussed above with respect to claims 13 and 27.

Conclusion

The applicant respectfully submits that all claims 1-30 are in condition for allowance, which action is requested.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 8/8/03

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Title of the Invention
CREATING TRAPS WITH ASYMMETRIC WIDTHS

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Enclosures
·Amendment/Response (3 pages); and
·Return receipt postcard

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